

## **DIC Group Human Rights Policy**

### **Respect for Human Rights**

We, the DIC Group (including Sun Chemical Group), are committed to respecting the human rights of all stakeholders in all aspects of our business activities. In 2018, the DIC Group adopted a human rights policy (the “Policy”) based on global human rights codes. We strive to protect and promote human rights through our business activities.

### **Basic Principles on Human Rights**

The DIC Group supports and respects the United Nations “International Bill of Human Rights,” the International Labour Organization (ILO) “Declaration on Fundamental Principles and Rights at Work,” and the United Nations “Guiding Principles on Business and Human Rights.” In addition, we respect the “Ten Principles of the United Nations Global Compact.” The DIC Group Code of Business Conduct (“DIC Group Code”), which outlines standards that DIC Group employees are expected to follow, contains provisions prohibiting human rights violations and requiring respect for diversity. These reflect the philosophies that form the foundation of the DIC Group’s corporate activities. All DIC Group employees must display understanding of the DIC Group Code and provide written assurances to abide by it. The DIC Group promotes awareness among the DIC Group executives and employees, and works to enhance its inspection and monitoring structure, to reinforce respect for human rights and to prevent violations of human rights.

#### **1. Global Labor Standards**

This Policy, which reflects global human rights codes, articulates the DIC Group’s fundamental stance on respect for human rights.

#### **Child Labor and Forced Labor**

We strictly prohibit the use of child labor and forced labor in our operations and supply chain. We adhere to applicable laws and regulations regarding the minimum working age and fair compensation, and we will not engage in any form of slavery or forced labor.

#### **Freedom of Association and Collective Bargaining**

We respect employees’ rights to associate freely, join labor unions, and participate in collective bargaining, while adhering to both local laws and global standards.

#### **Work Conditions**

We value the well-being and safety of every employee, recognizing that each person is immeasurably valuable. Our dedication extends beyond numbers and statistics; it centers on people and their families. We pledge to maintain safe working conditions, offer comprehensive training, and instill a profound culture of safety to ensure that everyone of our employees returns home from work safely.

#### **Fair Compensation and Benefits**

We are dedicated to providing fair compensation, comprehensive benefits, and opportunities for professional growth to all our employees. Our compensation and benefits packages adhere to relevant laws and industry standards.

#### **Anti-Harassment**

In alignment with the DIC Group’s policies and the legal frameworks of many countries, we unequivocally prohibit any form of discrimination, harassment, hazing, intimidation, or retaliation within the workplace or at any business-related function, event, or meeting. Our commitment to human rights is unwavering, and we are dedicated to fostering an inclusive and respectful environment for all.

## **Equal Opportunity**

We are committed to providing equal opportunities to all individuals throughout the entire employment process, including during recruiting, hiring, development, promotion, and compensation processes, and in all other terms and conditions of employment. This commitment extends without regard to factors such as race, religion, sex, skin color, age, marital status, gender, gender identity, sexual orientation, physical or mental disability (or lack thereof), veteran status, national origin, or any other characteristic protected by applicable laws and regulations in each jurisdiction.

## **Diversity, Equity, Inclusion, Belonging (DEIB) Policy:**

The DIC Group is dedicated to fostering a diverse culture (Diversity) where all decisions are made equitably (Equity) and every individual is treated with dignity (Inclusion). Our commitment to these principles will lead to a diverse workforce, which inherently contributes value to our business through the satisfaction and engagement of our people (Belonging). We firmly believe in upholding these values as fundamental to our corporate ethos and mission.

## **2. Scope of Application**

This Policy applies to all executives and employees of the DIC Group. The DIC Group shall also encourage its business partners and suppliers to adhere to this Policy and will cooperate with them to advance respect for human rights.

## **3. Responsibility to Respect Human Rights**

The DIC Group strives to be an organization that does not tolerate any form of discrimination, including discrimination based on race, religion, sex, skin color, age, marital status, gender, gender identity, sexual orientation, physical or mental disability (or lack thereof), veteran status, national origin, or any other characteristic protected by applicable laws and regulations in each jurisdiction. All members of the DIC Group will work together to fulfill the DIC Group's corporate social responsibility goals while enabling every individual in the DIC Group to exercise their abilities to the fullest.

The DIC Group shall strive to fulfill its responsibility to respect human rights by ensuring that its business activities do not result in violations of the human rights of stakeholders, as well as by preventing human rights abuses in the course of its business. In the event that its business partners or suppliers cause adverse human rights impacts through their businesses, products, or services, the DIC Group—while not directly intervening—shall use its influence to encourage the responsible parties to cease or alter the practices responsible for such adverse impacts.

## **4. Human Rights Due Diligence**

To fulfill its responsibilities with regard to respect for human rights, the DIC Group has created a human rights due diligence system, which continues to evolve in an ongoing basis to identify, evaluate and address negative impacts of human rights risks.

The DIC Group will identify and evaluate negative impacts on human rights and apply the results to our supplier management decisions.

## **5. Corrective/Remedial Actions**

Should the DIC Group cause adverse human rights impacts or should it become evident that it has been complicit in causing such impacts, the DIC Group shall take appropriate corrective and/or remedial actions in response.

The communication channel (Ethics Point) at the bottom of the page is made available for any reporting of human rights-related comments, questions or issues. Please feel free to contact us.



## **6 . Compliance with applicable laws**

The DIC Group will comply with the laws and regulations of all countries and regions in which we operate. Where there is any conflict between a country's laws and internationally recognized human rights standards, we will seek ways to respect internationally recognized human rights principles to the maximum extent possible.

## **7 . Disclosure and Education/Training**

The DIC Group shall periodically report publicly on the progress of initiatives implemented in line with this Policy. To ensure the effectiveness of this Policy, the DIC Group shall also provide appropriate training to its executives and employees.

## **8 . Dialogue and Discussion**

The DIC Group shall engage with stakeholders regarding initiatives implemented in line with this Policy by creating opportunities for dialogue and promoting discussion in good faith.

### **APPENDIX : Contact Information**

Ethics Point contact information for the reporting of any suspected violations of human rights is provided below. Please feel free to contact us.

#### **Ethics Point**

To report a concern or possible violation of the law or of DIC's policies, you are encouraged to contact the DIC Ethics Hotline at 00531-121520 / 0066-33-112505 (Japan), or via the internet at [www.EthicsPoint.com](http://www.EthicsPoint.com) by selecting your language of choice, then click on "File a New Report" and when prompted, enter "DIC Corporation" or "Sun Chemical" as the organization name, and follow the instructions. A list of phone numbers for countries outside of Japan is located at this website as well.

The Sun Chemical Ethics Hotline at 1.866.730.7932 (U.S., Canada, and Puerto Rico), or via the internet at [www.EthicsPoint.com](http://www.EthicsPoint.com) by selecting your language of choice, then click on "File a New Report" and when prompted, enter "Sun Chemical" as the organization name, and follow the instructions. A list of phone numbers for countries outside of the U.S., Canada, and Puerto Rico is located at this website as well.

#### **Additional Information:**

1. This Policy is established as of May 31, 2018.
2. This Policy is partially revised as of November 15, 2023.